



STATE OF IDAHO
DIVISION OF
ENVIRONMENTAL QUALITY

1410 North Hilton, Boise, ID 83706-1255, (208) 373-0502

Philip E. Batt, Governor

October 23, 1998

CERTIFIED MAIL #P 102 109 641

Bob Pluid, President
North Idaho Energy Logs
P.O. Box 571
Moyie Springs, Idaho 83845

RE: North Idaho Energy Logs (Moyie Springs)
Tier II Operating Permit (#021-00015)

Dear Mr. Pluid:

On February 26, 1998, representatives from the Division of Environmental Quality (DEQ) visited North Idaho Energy Logs (NIEL). NIEL was notified on March 23, 1998, that as a result of the site visit, it was determined that a Tier II operating permit should be issued for the facility.

On July 10, 1998, a proposed Tier II OP was issued for public comment. The public comment period was from August 3, 1998, through September 2, 1998. On August 10, 1998, and August 13, 1998, DEQ received comments about the content of the proposed OP. These comments were addressed by DEQ in the response package.

Based on review of your application, state and federal rules and regulations, and comments received, DEQ finds this project meets the provisions of IDAPA 16.01.01.400 (Rules for the Control of Air Pollution in Idaho). Enclosed is the ^{final} proposed Tier II OP (#021-00015) for the emissions that exist at your facility.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to the Idaho Department of Health and Welfare Rules, Title 5, Chapter 3, "Rules Governing Contested Case Proceedings and Declaratory Rulings," by filing a petition with the Hearings Coordinator, Department of Health and Welfare, Administrative Procedures Section, 450 West State Street - 10th Floor, Boise, Idaho 83720-5450, within thirty-five (35) days of the date of this decision.

If you have any questions regarding the terms or conditions of the enclosed permit, please contact Susan J. Richards, Bureau Chief, Air Quality Permitting Bureau, Air and Hazardous Waste, DEQ, at (208) 373-0502.

Sincerely,


A handwritten signature in black ink that reads "Orville D. Green".

Orville D. Green
Assistant Administrator
Air & Hazardous Waste

ODG\SJR\RM\jrl...permits\NIEL\NIEL-f.COV

Enclosure

cc: G. Fransen, CDA Regional Office
J. Greaves, EPA-IOO
Source File
COF

STATE OF IDAHO AIR POLLUTION OPERATING PERMIT GENERAL INFORMATION	<div style="text-align: center;"> PERMIT NUMBER <div style="display: flex; justify-content: center; gap: 10px;"> <div style="border: 1px solid black; padding: 2px 5px;">0</div> <div style="border: 1px solid black; padding: 2px 5px;">2</div> <div style="border: 1px solid black; padding: 2px 5px;">1</div> <div style="font-size: 1.2em;">-</div> <div style="border: 1px solid black; padding: 2px 5px;">0</div> <div style="border: 1px solid black; padding: 2px 5px;">0</div> <div style="border: 1px solid black; padding: 2px 5px;">0</div> <div style="border: 1px solid black; padding: 2px 5px;">1</div> <div style="border: 1px solid black; padding: 2px 5px;">5</div> </div> </div> <div style="display: flex; justify-content: space-around; margin-top: 10px;"> <div style="text-align: center;"> AQCR <div style="border: 1px solid black; padding: 2px 5px;">0</div> <div style="border: 1px solid black; padding: 2px 5px;">6</div> <div style="border: 1px solid black; padding: 2px 5px;">3</div> </div> <div style="text-align: center;"> CLASS <div style="border: 1px solid black; padding: 2px 5px;">B</div> <div style="border: 1px solid black; padding: 2px 5px;">1</div> </div> <div style="text-align: center;"> SIC <div style="border: 1px solid black; padding: 2px 5px;">2</div> <div style="border: 1px solid black; padding: 2px 5px;">4</div> <div style="border: 1px solid black; padding: 2px 5px;">9</div> <div style="border: 1px solid black; padding: 2px 5px;">9</div> </div> </div> <div style="display: flex; justify-content: space-around; margin-top: 10px;"> <div style="text-align: center;"> ZONE <div style="border: 1px solid black; padding: 2px 5px;">1</div> </div> <div style="text-align: center;"> UTM COORDINATE (km) <div style="border: 1px solid black; padding: 2px 5px;">5</div> <div style="border: 1px solid black; padding: 2px 5px;">5</div> <div style="border: 1px solid black; padding: 2px 5px;">7</div> <div style="font-size: 1.2em;">.</div> <div style="border: 1px solid black; padding: 2px 5px;">1</div> <div style="font-size: 1.2em;">,</div> <div style="border: 1px solid black; padding: 2px 5px;">5</div> <div style="border: 1px solid black; padding: 2px 5px;">3</div> <div style="border: 1px solid black; padding: 2px 5px;">9</div> <div style="border: 1px solid black; padding: 2px 5px;">6</div> <div style="font-size: 1.2em;">.</div> <div style="border: 1px solid black; padding: 2px 5px;">5</div> </div> </div>	
1. PERMITTEE North Idaho Energy Logs		
2. PROJECT Tier II Operating Permit		
3. MAILING ADDRESS P.O. Box 571	TELEPHONE # (208) 267-5311	COUNTY Boundary
4. CITY Movie Springs	STATE Idaho	ZIP CODE 83845
5. PERSON TO CONTACT Bob Pluid	TITLE President	
6. EXACT PLANT LOCATION Adjacent to Old Highway 2, one mile west of Movie Springs		
7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS Compressed Fireplace Logs and Compressed Wood Pellets		
8. GENERAL CONDITIONS <p>This permit is issued according to the Rules for the Control of Air Pollution in Idaho, Section 16.01.01.400 and pertains only to emissions of air contaminants which are regulated by the State of Idaho and to the sources specifically allowed to be operated by this permit.</p> <p>All documents, including, but not limited to, progress reports, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications shall contain a certification by a responsible official in accordance with IDAPA 16.01.01.123. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. The certification shall provide the signature and title of the responsible official and the date of the signature.</p> <p>THE PERMIT HAS BEEN GRANTED ON THE BASIS OF OPERATION AND DESIGN INFORMATION MADE AVAILABLE TO THE DEPARTMENT OF HEALTH AND WELFARE, DIVISION OF ENVIRONMENTAL QUALITY (DEQ). CHANGES IN DESIGN, OPERATION, OR EQUIPMENT THAT RESULT IN ANY CHANGE IN THE NATURE OR AMOUNT OF EMISSIONS MUST BE APPROVED IN ADVANCE BY DEQ.</p>		
<div style="display: flex; justify-content: space-between; align-items: flex-end;"> <div style="width: 40%;">  _____ ASSISTANT ADMINISTRATOR DIVISION OF ENVIRONMENTAL QUALITY </div> <div style="width: 50%; text-align: right;"> ISSUED DATE <u>OCTOBER 23, 1998</u> EXPIRATION DATE <u>OCTOBER 23, 2003</u> </div> </div>		

**AIR POLLUTION OPERATING PERMIT
PERMITTEE, PROJECT, AND LOCATION**

North Idaho Energy Logs
Tier II Operating Permit
Moyle Springs, Idaho

PERMIT NUMBER

0 2 1 - 0 0 0 1 5

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Compressed Fireplace Logs and Compressed Wood Pellets

1. EMISSION LIMITS
1.1 Emission Limits

Particulate matter (PM) and particulate matter with an aerodynamic diameter less than or equal to a nominal ten micrometers (PM-10) emissions shall not exceed eleven (11) pounds per hour (lb/hr) from the dryer cyclone and shall not exceed two (2) pounds per hour (lb/hr) from the chipper hog baghouse.

1.2 Opacity Limits

Emissions from any stack, vent, or functionally equivalent opening shall not exceed twenty percent (20%) opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period as required by IDAPA 16.01.01.625 (Rules for the Control of Air Pollution in Idaho). Opacity shall be determined by the procedures contained in DEQ's "Procedures Manual for Air Pollution Control", Section II (Evaluation of Visible Emissions Manual).

1.3 Visible Emission Limits

Visible fugitive emissions shall not be observed leaving the property boundary for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period. Visible emissions shall be determined by EPA Reference Method 22, as described in 40 CFR 60, Appendix A, or DEQ approved alternative method.

2. OPERATING REQUIREMENTS
2.1 Baghouse Installation

The baghouse controlling emissions from the chipper hog cyclone shall be operated as efficiently as practicable to control emissions from Cyclone. The pressure drop across the baghouse shall be maintained within manufacturer's or Operation and Maintenance (O&M) Manual specifications. Documentation of the operating pressure drop specifications for the baghouse shall remain on-site at all times and shall be made available to DEQ representatives upon request.

2.2 Reasonable Control of Fugitive Emissions

All reasonable precautions shall be taken to prevent particulate matter from becoming airborne as required in IDAPA 16.01.01.651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust emitting operations to human habitations and/or activities and atmospheric conditions which might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:

- 2.2.1 Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands;
- 2.2.2 Application, where practical, of asphalt, oil, water, or suitable chemicals to, or covering of dirt roads, material stockpiles, and other surfaces which can create dust;

ISSUED DATE: OCTOBER 23, 1998
EXPIRATION DATE: OCTOBER 23, 2003

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**AIR POLLUTION OPERATING PERMIT
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North Idaho Energy Logs
Tier II Operating Permit
Moyie Springs, Idaho

PERMIT NUMBER

0 2 1 - 0 0 0 1 5

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SOURCE

Compressed Fireplace Logs and Compressed Wood Pellets

- 2.2.3 Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations;
- 2.2.4 Covering, where practical, open-bodied trucks transporting materials likely to give rise to airborne dusts;
- 2.2.5 Paving of roadways and their maintenance in a clean condition, where practical; or
- 2.2.6 Prompt removal of earth or other stored material from streets, where practical.

2.3 Throughput Limit

The permittee shall not process more than one hundred forty four tons per day (144 ton/day) of raw product.

3. MONITORING AND RECORDKEEPING REQUIREMENTS
3.1 Monitor Operating Parameters

The Permittee shall monitor and record the pressure drop across the baghouse on a daily basis. The most recent two (2) years' compilation of records shall be kept on-site, in a log, and be made available to DEQ representatives upon request.

3.2 Operations and Maintenance Manual Requirements

Within sixty (60) days of the issuance of this permit, the Permittee shall have developed an Operation and Maintenance (O&M) Manual for the baghouse which describes the procedures that will be followed to comply with General Provisions B and the air pollution control device requirements contained in this permit, including installation and maintenance of bag filters. This Manual shall remain on-site at all times and shall be made available to DEQ representatives upon request.

3.3 Visible Emissions Monitoring

Opacity shall be determined using the procedures contained in DEQ's "Procedures Manual for Air Pollution Control". The Permittee shall monitor and record the visible emission observations, complete with conditions of time of observation, from each cyclone stack on a weekly basis on a log. The log shall be kept at the facility for the most recent two (2) year period and be made available to DEQ representatives upon request.

3.4 Log of Reasonable Control

The permittee shall keep a log of control measures taken to reasonably control fugitive emissions. The log shall be kept at the facility for the most recent two (2) year period and be made available to DEQ representatives upon request.

3.5 Throughput Monitoring

The permittee shall monitor and record the daily tonnage of final product to demonstrate compliance with Section 2.3 of this permit. The production record shall be kept at the facility for the most recent two (2) year period and be made available to DEQ representatives upon request.

ISSUED DATE:	OCTOBER 23, 1998
EXPIRATION DATE:	OCTOBER 23, 2003

**AIR POLLUTION OPERATING PERMIT
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Moyie Springs, Idaho

PERMIT NUMBER

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The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Compressed Fireplace Logs and Compressed Wood Pellets

4. REPORTING REQUIREMENTS**4.1 Certification of Documents**

All documents, including but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications submitted to DEQ shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

ISSUED DATE: OCTOBER 23, 1998
EXPIRATION DATE: OCTOBER 23, 2003

RD-24...-10/23/98-10/23/03

TIER II OPERATING PERMIT GENERAL PROVISIONS

- A. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code 39-101 et. seq.
- B. The Permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
- C. The Permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
- 1) To enter upon the Permittee's premises where an emission source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
 - 2) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emission testing (i.e., performance tests) in conformance with state approved or accepted EPA procedures when deemed appropriate by the Director.
- D. Except for data determined to be confidential under Section 39-111, Idaho Code, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Division of Environmental Quality.
- E. Nothing in this permit is intended to relieve or exempt the Permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
- F. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the Permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.
- G. This permit shall be renewable on the expiration date, provided the Permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within sixty (60) days after receipt of the Director's request shall cause the permit to be voided.
- H. The Director may require the Permittee to develop a list of Operation and Maintenance Procedures which must be approved by DEQ. Such list of procedures shall become a part of this permit by reference, and the Permittee shall adhere to all of the operation and maintenance procedures contained therein.
- I. Performance tests (i.e.; air emission source tests) conducted pursuant to testing requirements in this permit must be conducted in accordance with DEQ's Procedures Manual for Air Pollution Control. Such testing shall not be conducted on weekends or state holidays unless the Permittee obtains prior DEQ approval.

The Permittee shall submit a test protocol and a proposed test date for each performance test required by this permit to DEQ for approval at least thirty (30) days prior to each respective test date (including each test date for periodic tests such as, for example, annual tests). The Permittee shall promptly notify DEQ of any change in the proposed test date and shall provide at least five (5) working days advanced notice prior to conducting any rescheduled test, unless DEQ approves a shorter notice period.

Within forty-five (45) days of the date on which a performance test required by this permit is concluded, the Permittee shall submit to DEQ a performance test report for the respective test. The performance test report shall include any and all process operating data required to be recorded during the test period as well as the test results, raw test data, and associated documentation.

The maximum allowable source operating rate shall be limited to 120% of the average operating rate attained during the most recent performance test conducted pursuant to this permit which demonstrated compliance with the respective pollutant emission limit unless; (1) a more restrictive operating limit is specified elsewhere in this permit or; (2) at such an operating rate, emissions would exceed any emission limit(s) set forth in this permit.

- J. The provisions of this permit are severable; and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

ISSUED DATE:	OCTOBER 23, 1998
EXPIRATION DATE:	OCTOBER 23, 2003

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